

United States Courts
Southern District of Texas
FILED

NOV 15 2021

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA

Vs.

**Savannah Mikayla Jacobs
Sierra Cheyenne Weaver**

CRIMINAL COMPLAINT

Case Number: **C-21-1387M**

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about November 13, 2021 in Kenedy County, in the
(Date)

Southern District of Texas, defendant, **Savannah Mikayla Jacobs
Sierra Cheyenne Weaver**

did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law


in violation of Title 8 United States Code, Section(s) 1324
I further state that I am a(n) Border Patrol Agent and that this complaint is based on the
Official Title
following facts:

See Attached Affidavit of U.S. Border Patrol Agent **Joe Gonzalez**

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on the:


Signature of Complainant
Joe Gonzalez
Printed Name of Complainant

November 15, 2021

Date

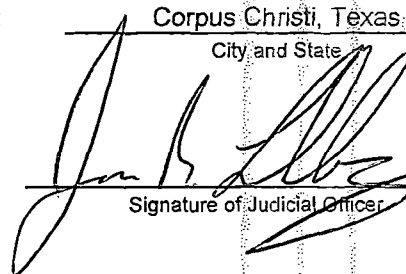
Jason B. Libby U.S. Magistrate Judge

Name and Title of Judicial Officer

at

Corpus Christi, Texas

City and State


Signature of Judicial Officer

AFFIDAVIT

The information contained in this report/affidavit is based upon my personal participation in the investigation, which included, but is not limited to information relayed to me by other agents and officers participating in the investigation.

FACTS/DETAILS:

On November 13, 2021, at approximately 10:00 p.m., a black Ford Focus with two visible subjects approached the primary inspection lane at the United States Border Patrol Checkpoint near Sarita, Texas. The female driver, later identified as Savannah Mikayla JACOBS, and the front seat passenger, later identified as Sierra Cheyenne WEAVER, both stated they are United States citizens. The Border Patrol canine handler then advised the primary agent of an alert on the vehicle by his service canine. JACOBS was advised to pull over to the secondary inspection area.

During the secondary inspection, agents discovered three subjects hiding in the trunk of the vehicle. Agents determined the three subjects hiding in the trunk to be citizens and nationals of Honduras and Mexico without the proper documents to be in, or remain in, the United States legally. All subjects involved were placed under arrest and escorted inside the checkpoint for further investigation.

MIRANDA RIGHTS WARNING:

All subjects were read their rights in their preferred language and signed accordingly that they understood their rights. The driver, JACOBS, declined to give a statement without the presence of an attorney.

Defendant: Sierra Cheyenne WEAVER

WEAVER stated she and her childhood friend, JACOBS, drove from San Antonio and went to an unknown city in the Rio Grande Valley on November 13, 2021, arriving at approximately 6:00 p.m. JACOBS was driving the vehicle registered to WEAVER, who was in the front passenger seat the entire time. WEAVER claimed when they stopped at a gas station, three people got in the backseat of their vehicle. On their way north on Highway 77, WEAVER saw the lights to the checkpoint, and the three men in the backseat then lowered the backseat and crawled into the trunk of the car to conceal themselves. WEAVER claimed to not know the three men were in the United States illegally and she did not receive any money or any benefit from them. WEAVER claimed she does not speak Spanish and was unable to communicate with the three men.

NOTE:

WEAVER has two active warrants out of Florida and Texas.

Material Witness: Oscar Uriel ROMERO-Carmona

ROMERO stated he crossed the border through Matamoros on Tuesday, November 9th, 2021, and was taken to a hotel, where he stayed until Saturday, November 13th, 2021. ROMERO

stated he was then taken to a store, which he could not identify as he was unfamiliar with the area and told to simply wait for further instructions. Once the pickup vehicle arrived (a black Ford Focus), ROMERO was given instructions by a woman (JACOBS) using a smartphone app to communicate and was told to get inside the trunk of the vehicle. He was inside the trunk of the vehicle with two other individuals. ROMERO stated he felt afraid while he was inside the trunk. ROMERO claimed he was not told how to get out of the trunk if need be or if there was an accident. ROMERO stated it was also cold while inside of the trunk. ROMERO was able to identify both the driver and passenger of the vehicle.

DISPOSITION:

The facts of this case were presented to the Assistant United States Attorney Office who accepted Savannah Mikayla JACOBS and Sierra Cheyenne WEAVER for prosecution of 8 USC 1324, Alien Smuggling. Oscar Uriel ROMERO-Carmona will be held as a Material Witness.


Joe Gonzalez
Border Patrol Agent

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on this day November 15, 2021


Jason B. Libby
United States Magistrate Judge